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March 21, 2018

VIA FIRST CLASS MAIL

The Honorable Stewart M. Bernstein  
United States Bankruptcy Court for the Southern District of New York  
One Bowling Green  
New York, NY 10004

**Re: In re Gawker Media, LLC, No. 16-11700**

Dear Judge Bernstein:

As you know, we represent Respondents RJ Bell (aka Randall Busack) and Pregame Media in the proceeding brought by Ryan Goldberg seeking enforcement of the release and injunction provisions of the Bankruptcy Plan approved by the Court.

We are in receipt of a letter written by Peter M. Gilhuly, addressed to the Court and dated March 20, 2018, regarding a state court action brought by International Scherick, LLC against Gizmodo Media Group, LLC ("Gizmodo"), which Gizmodo claims to be brought in violation of the release and injunction provisions of the Bankruptcy Plan.

We believe it is inappropriate that Mr. Gilhuly waits until the eve of the scheduled trial date in the Goldberg matter (which has now been postponed due to the snowstorm) to present this matter to the Court in an obvious attempt to influence a trial that Mr. Gilhuly's client is not a party to. (The Court has already ruled on the scope of the Plan's releases and injunction with respect to my clients' claims against Gizmodo.)

In any event, it is my understanding that the plaintiffs in the International Scherick matter are in the process of amending their complaint, and intend to assert state law claims that clearly comply with the terms of this Court's order with respect to the scope of claims that may be asserted against Gizmodo. Once that amended complaint is filed, Gizmodo can review it and determine whether it still wishes to seek a status conference with this Court.

Very truly yours,

/s/ Dilan A. Esper  
DILAN A. ESPER  
**HARDER LLP**